

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 19-cr-10345-DPW
)	
DANA A. PULLMAN, and)	
ANNE M. LYNCH,)	
)	
Defendants)	

JOINT MEMORANDUM FOR INITIAL STATUS CONFERENCE

The parties submit this joint memorandum addressing the issues set out in Local Rule 116.5(a).

1. Status of Automatic Discovery and Any Pending Discovery Request

On October 21, 2019, the government produced automatic discovery as required under the Local Rules.

2. The Timing of Any Additional Discovery to be Produced

The government will make such further and pre-trial disclosures as are required by law.

3. The Timing of Any Additional Discovery Requests

There are no pending discovery requests.

4. Protective Orders

The government intends to move for entry of a protective order. The defendants reserve their right to contest specific provisions of such a motion but do not object in general to having the Court enter a protective order that will govern the use and dissemination of discovery.

5. The Timing of Pretrial Motions

The parties will discuss the timing of pretrial motions after resolution of the defendants' pending motions filed under seal, and propose a schedule to the Court.

6. The Timing of Expert Witness Disclosures

The defendants request expert discovery pursuant to Fed. R. Crim. P. 16(a)(1)(G) and the parties request that the Court order that such discovery be produced no later than 60 days prior to trial in this matter, with reciprocal discovery to be produced no later than 30 days before trial.

7. Excludable delay

The parties jointly ask the Court to exclude the time from November 5, 2019 until the date of the next status conference, under 18 U.S.C. § 3161(h)(7)(A), because the parties have needed the time, and continue to need the time, to produce and review discovery in this case. The ends of justice served by this exclusion outweigh the interests of the public and the defendants in a speedy trial.

8. Final/interim status conference

The parties ask the Court to schedule an interim status conference in approximately 60 days.

Respectfully submitted,

ANDREW E. LELLING
United States Attorney

By: /s/Kristina E. Barclay
Kristina E. Barclay
Neil J. Gallagher, Jr.
Assistant U.S. Attorneys

Dated: October 29, 2019

DANA A. PULLMAN
By his counsel,

/s/Martin Weinberg
Martin Weinberg, Esq.

ANNE M. LYNCH

By her counsel,

/s/Scott Lopez

Scott Lopez, Esq.